Lon A. Jenkins (4060)
Tami Gadd-Willardson (12517)
MaryAnn Bride (13146)
Katherine T. Kang (14457)
OFFICE OF THE CHAPTER 13 TRUSTEE
405 South Main Street, Suite 600
Salt Lake City, Utah 84111
Telephone: (801) 596-2884
Facsimile: (801) 596-2898

Email: utahtrusteemail@ch13ut.org

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH CENTRAL DIVISION

IN RE: CASE: 17-29801

KURTIS N. HENDERSON CHAPTER 13

SHELLA R. HENDERSON

Hon. R. KIMBALL MOSIER

Debtors

Hearing: 06/26/2019

TRUSTEE'S RESPONSE TO DEBTORS' OBJECTION TO MOTION TO DISMISS AND REQUEST FOR ATTORNEY'S FEES

Lon A. Jenkins, Chapter 13 Trustee, by and through counsel, hereby responds to the above-referenced Motion as follows:

- 1. As of the date of this response, the Debtors are delinquent in the amount of \$1,663.00.
- 2. The Trustee objects to the denial of his Motion to Dismiss unless the Debtors are current in plan payments, to include the June 25, 2019 payment, no later than June 26, 2019.
 - 3. The total delinquency to be cured prior to the hearing date is \$2,090.00.
- 4. Unless a fee application is filed, the Trustee objects to an Order granting fees and costs because the request does not comply with 11 U.S.C. § 330 or Fed. R. Bankr. P. 2016.

WHEREFORE, the Trustee objects to entry of an Order granting the relief requested in the Motion.

Dated: May 31, 2019

/s/ Katherine T. Kang
Attorney for Chapter 13 Trustee

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Trustee's Response was served on the following parties on May 31, 2019:

ROBERT A. EDER, JR, ECF Notification

/s/ Helen Doherty